

94339

DEPT. OF TRANSPORTATION
DOCKET SECTION

WEATHERSTONE AIR, INC.

98 OCT -1 PM 3: 58

September 28, 1998

U.S. Department of Transportation Dockets
Docket No. FAA-98-4390 - 27
400 Seventh St., SW
Rm. Plaza 401
Washington, DC 20590

Dear Sir:

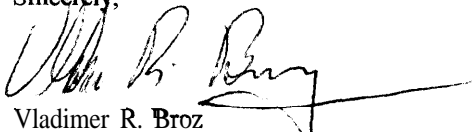
A special thanks to the FAA and all the people involved in developing this long awaited rule change. This rule change will soon allow us the option of using the ATC system on days that we would have had to scud-run in marginal VFR conditions. This will increase our margin of operational safety and better utilize the unique characteristics of the helicopter.

Option 2- Partially Tabular Format is the form we prefer for the following reason.-. This contains the wording "weather reports and/or prevailing weather forecast". The use of "prevailing weather" vs. "chance or slight chance" of certain weather conditions would further facilitate our use of the air **traffic** control system.

However, there is no mention in this NPRM of excluding helicopters from the requirement to use Part 97 alternate airport minimums if published in that procedure. See Part 91.169 (c.) (1). The new rule should specifically address this problem by adding an "except helicopters" to Part 91.169 (c.) (1) . Without this clarification, the NPRM would be nearly useless in the Northeast with all the higher than standard alternate requirements at the airports we would be likely to use.

With the above addition to the Rule, this would be a very positive start to changes in the way helicopters are allowed to operate within the ATC.

Sincerely,



Vladimir R. Broz
Director of Operations
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